

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HAROLD MCCADD,)	
)	
Plaintiff,)	No: 14- CV- 8496
v.)	
VILLAGE OF BOLINGBROOK, et. al.)	Judge Sara L. Ellis
Defendants.)	

PLAINTIFF’S MOTION FOR THE ENTRY OF JUDGMENT PURSUANT TO RULE 68

NOW COMES Plaintiff, HAROLD MCCADD, by and through his attorneys, Abby D. Bakos and Brendan Shiller of the Shiller Preyar Law Offices, with the instant Motion For Entry of Judgment pursuant to Fed.R.Civ.P. 68.

1. On April 5, 2016, Plaintiff received Defendants’ Rule 68 Offer of Judgment (hereinafter “Defendants’ Offer”).
2. On April 8, 2016, Plaintiff filed Plaintiff’s Notice of Acceptance of Defendants’ Offer of Judgment, a copy of Defendants’ Offer and Proof of Service. (Dkt. 51).
3. Consequently, Plaintiff respectfully requests that this Court enter an Order for Judgment in favor of Plaintiff and against Defendant Village of Bolingbrook on Counts Four (4) and Five (5) of the Amended Complaint in the amount of \$75,001.00, plus reasonable attorney fees and costs accrued to April 5, 2016.
4. The parties’ proposed Judgment Order is attached hereto as Exhibit A.
5. A copy of the same has been sent to this Court’s Proposed Order Inbox via email.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter Judgment in favor of Plaintiff and against Defendant Village of Bolingbrook on Counts Four (4) and Five (5) of the Amended Complaint in the amount of \$75,001.00, plus reasonable attorney fees and

costs accrued to April 5, 2016 as set forth in the Parties' Proposed Order attached hereto as Exhibit A.

Respectfully submitted,

/s/ Abby D. Bakos
Abby D. Bakos

/s/ Brendan Shiller
Brendan Shiller

Shiller Preyar Law Offices
601 S. California Ave.
Chicago, Illinois 60612

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that she served a copy of the foregoing Plaintiff's Motion For Entry of Judgment Pursuant to Rule 68 upon the following attorneys of record via the EM/ECF system on April 11, 2016:

TO: Stephen Miller
smiller@robbins-schwartz.com
Nikoleta Lamprinakos
nlamprinakos@robbins-schwartz.com
Rachel Lutner
rlutner@robbins-schwartz.com
John Eagan
jeagan@robbins-schwartz.com
Robbins, Schwartz, Nicholas, Lifton & Taylor, Ltd.
55 West Monroe Street, Suite 800
Chicago, Illinois 60603
312.332.7760

Respectfully submitted,

/s/ Abby D. Bakos
Abby D. Bakos

Shiller Preyar Law Offices
601 S. California Ave.
Chicago, Illinois 60612